RCRA RECORDS CENTER OTHER

From:

Tom McCusker (TMCCUSKE)

To:

BOMEARA

Date:

Tuesday, May 4, 1993 12:58 pm

Subject:

Multimedia Checklist American Cyanamid

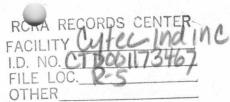
Hi Bob, Attached is a completed multimedia checklist concerning American Cyanamid located in Wallingford, CT. No Air-related violations were observed. There were several PCB containing capacitors (@ 200) located at the facility which the PCB Program may want to inspect. Due to time constraints we were not able to look at this equipment. I will forward the checklist to Suzanne Parent so she can assign someone to follow this up if she feels it is necessary. In addition, I will forward the checklist to Larry Brill and Chris Barry as required and to Steve Yee who conducted the inspection with me. Thanks, Tom M.

CC:

CBARRY, LBRILL, SPARENT, SYEE

Files:

C:\WP\DATA\MULTIMED.ACY



REGION I MULTI-MEDIA CHECKLIST

GENERAL INFORMATION Inspector: <u>Tom McCusker</u> Date: <u>4/28/93</u>

	try Name: American Cyanamia Contact: Charles Cappannari,
Env.	Mgr.
Addre	ess: South Cherry St Wallingford CT 06492 (STREET) (CITY) (STATE) (ZIP)
	(STREET) (CITY) (STATE) (ZIP)
Phone	No.: (203) 284-4384 SIC Code: _ No. Employees: 650-700
Produ	acts mfgd. and description of facility: The facility
opera	ations include manufacturing plastics and resins as
inter	mediate products for various industries (automotive,
mealo	cal, paint, and paper). Final products made with the
plast	cics and resins include electrical fixtures, tail lights for
autor	mobiles, optical lenses, medical devices, food containers,
paint	cs, chairs, etc.
Air:	Stationary Source Compliance
1.0	Did you observe opaque smoke emitted from a smokestack (dark enough to obscure anything behind the plume? No - If yes - Which process line (be specific, i.e., boiler No. 4)? N/A - Air pollution control equipment out of service? N/A - If yes - When will it be back on line? N/A
2.OP	Did you smell any strong odors? No If yes, from what process? N/A What chemicals (i.e., solvents) were causing the odors? N/A Is the process controlled by air pollution control equipment? N/A
3.1	Has the facility added any processes or expanded any pre- existing processes in the last two years which emits air pollutants? Yes - If yes, what type of process was added? Powder Resin Processes Did the facility obtain a state air permit? None required, since the additions did not trigger permit requirements.
4.I	a) Has the facility undergone any demolitions within the last 18 months? No
	b) Has the facility removed any asbestos from any facility components (pipes, boilers, ducts, etc.) within the past 18 months. Yes - If yes - Approx. how many square feet or linear feet? [Units should be expressed in terms of feet for pipe (length) and square feet for all other facility components (area)]. 4 different jobs: Job #1 removed 200 linear feet, 650 square feet, and 500 cubic feet; Job #2 removed 900 linear feet, 2700 square feet, and 6000 cubic feet; Job #3 removed 63 square feet; and, Job #4 removed 300 linear feet, 360 square feet, and 1100 cubic feet.
	If either 4.a or 4.b were "yes" - answer the following: c) Was notification for the project provided to EPA or any

other regulatory agency? Yes Name and address of any contractors involved: The same contractor was used on all 4 jobs - Murdock Asbestos Control of Branford, CT EPCRA (Chem. Inventory) Does the facility have on-site at any time during the calendar year threshold quantities of any Extremely Hazardous Substances (EHS) or any other hazardous materials requiring submission of Tier II chemical inventory forms? Yes - If yes - Have Tier II forms been filed with local and state planning authorities? EPCRA Section 313 (Toxic Release Inventory) Does the facility manufacture, process, or use any toxic chemicals in a quantity greater than 10,000 lbs per year? 2.I Has the facility submitted any toxic chemical release forms (Form R) to EPA? Yes FIFRA Does the facility manufacture, distribute, repackage, relabel, store or use pesticides? (Products which would be considered pesticides include disinfectants, sterilizers, germicides, algicides, virucides, swimming pool compounds, insecticides, fungicides, herbicides, etc.) No If yes, does the label bear an EPA registration and establishment number? N/A RCRA This was a consolidated inspection with RCRA, therefore I did not fill this portion of the checklist out. Does the facility generate or otherwise handle hazardous waste? If so, describe the types of hazardous waste generated/handled, and state whether it is generated on-site or received from off-site. 2.0P Do you see any waste stored in containers, drums, tanks, pails, or dumpsters? Note the approximate quantity of waste, and its location.

3.0P Are there any containers or tanks of hazardous waste which

are open or in poor condition (leaking, corroded, etc)? If

so, describe waste (ie., liquid, sludge, etc.), indicate markings on containers/tanks and the container/tank location(s). 4.0P Is there any evidence of spills or leaks or dumping to the ground, pits or lagoons? If so, note location and extent of release. Does the facility operate a boiler or industrial furnace? Has there been any incineration of hazardous waste on-site? If so, what type of hazardous waste, and is this an ongoing operation? SPCC How many gallons of oil does the facility store above and below ground? The facility stores oil in 8 tanks as follows: 1 diesel gas tank with a 3,000 gallon capacity; 2 #2 fuel oil tanks - 1 with a 30,000 gallon capacity the other with a 12,000 gallon capacity; 1 gasoline tank with a capacity of 3,000 gallons; 1 solvesso (raw material petroleum derivative) with a 12,000 gallon capacity; and, 1 heat transfer oil tank with a capacity of 3,000 gallons. - If the facility stores more than 660 gallons in a single tank or more than 1320 gallons in a number of tanks above ground or more than 42,000 gallons below ground - Does the facility have a certified SPCC (Spill Prevention, Control, and Countermeasure) plan signed by a P.E.? Yes 2.I Has the facility submitted a Facility Response Plan to EPA Region I? (Applies to facilities that store 1,000,000 gallons of oil, or 42,000 gallons of oil and transfer oil to vessels of any size). N/A TSCA PCB The facility has over 200 capacitors on site which contain PCB

material. We did not have enough time to look at this equipment, therefore, I recommend that someone in the PCB Program inspect the facility to determine compliance with the PCB requirements.

1.0P	Is there any evidence of spills or leaks from transformers, capacitors, or other liquid-filled electrical equipment that may contain PCBs? Yes: No:				
	If "yes", describe type of equipment and spill or leak:				
2.IP	If the above equipment has leaks or spills, is it considered to contain PCBs:				
	based on- marking with "Large PCB Mark"? Yes: No:				
	based on- equipment Nameplate? Yes: No:				
	based on- information from facility rep.? Yes: No:				
3.OP	Are there any PCB items (equipment, drums of waste or other containers) in storage for disposal? Yes: X No:				
4.1	Where are these items being stored and what is their condition? The PCB waste is stored in 4 sealed 55 gallon drums and labelled as PCB containing hazardous waste. The drums are in very good condition. No leakage or corrosion observed.				
TSCA	Core				
1.I	Does the facility manufacture (synthesize anew) any chemical substances in any amount? Yes If so, in simple terms, what chemical(s) do they make? They make urea formaldehyde, melamine formaldehyde, and methyl methacrylate.				
2.1	Does the facility import any chemical substances into the United States? (Company is "Importer of Record") No, this facility does not, but its Corporate Headquarters in New Jersey does.				
UST					
1.I	Does the facility store in USTs motor fuels, waste oils, and/or hazardous substances? (Note: USTs containing heating fuels for on-site heating purposes are exempted from RCRA UST.)				
If Ye	es, ask:				
2.I	Are the USTs registered with the state? X YESNO (Each state keeps notification data for USTs)				
3.I	Is some form of leak detection in use for the USTs system system is tank and associated piping)? X YES NO				

4.I	Are records available showing registration and monthly leak detection along with the yearly UST system tightness test? X_YESNO						
WATER							
A. D	A. DIRECT (NPDES) & INDIRECT (PRETREATMENT) DISCHARGERS						
	Does the facility use water in its manufacturing processes? Yes If yes						
	a) Does the facility discharge wastewater (process, sanitary, cooling, etc.) into a surface water, municipal sewer system, or a subsurface system? surface water b) Are all of the discharges covered by a permit? Yes, NPDES						
	Does the facility have floor drains? Yes If yes a) Are materials stored in a manner that leaks or spills could enter the floor drains? Yes b) Are materials dumped down the floor drains? Yes c) Where do the floor drains discharge (1) treatment facility, 2) municipal sewer, 3) subsurface system, or 4) surface water)? treatment facility						
OP	Does the facility treat its process and/or sanitary wastewater prior to discharge? Yes If yes a) Is the treatment equipment operational, clean, and well maintained? Yes b) Is the discharge free of solids, color and odor? Yes						
B. S.	TORM WATER						
1. 0	Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water. Yes If yes a) Is the storm water conveyed to a (1)treatment facility, (2)combined sewer, (3)separate storm sewer, or (4) surface water? Treatment Facility and Surface Water						
2. I	Are the storm water discharges covered by a permit or has the discharger applied for a permit? Yes, the storm water discharges are covered by the NPDES permit.						
3. 0	Are materials stored outside? Yes If yes a) Are materials (1) stored in sealed containers, under tarps or roofs, or (2) are they open to contact with precipitation? Materials are stored in sealed containers. b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff? Yes.						

1.I Does this facility <u>discharge</u> any <u>fluids to</u> drains, plumbing, or drainage systems connected to <u>UIC wells</u> that are designed for the subsurface emplacement of fluids <u>INTO the ground?</u> (See UIC Well Types below). <u>NO</u>
2.I Does this facility have a federal, state, or local permit authorizing this (these) underground injection system(s). <u>N/A</u>

- 3.I If treated sewage effluent is discharged below ground, are other fluid types disposed of in the sewage waste stream? N/A
- 4.0I Do you observe any floor or other surface drain(s) that are at risk of receiving fluid type(s) listed? If yes, does the drain discharge into the ground? No

WETLANDS

- 1.0 Within view, are there a) streams, ponds or other water bodies; b) vegetated areas with standing water; or c) areas with mucky, peaty or saturated (squishy) soils? If yes, have any of these areas been disturbed by waste/refuse disposal, storage of materials, ditching, or filling? If yes, briefly describe:

 There are wetlands on site, but they have not been disturbed.
- 2.I If yes to both "Observable" questions, does facility have a federal CWA section 404 permit, or any state or local permit authorizing the activity (ies) observed?

POLLUTION PREVENTION

1.I Does your facility have a pollution prevention, toxics use reduction, or RCRA waste minimization program? Yes

(Forward yes/no on waste min program to RCRA contact.)

Would you be interested in finding out more about pollution prevention techniques? \underline{No}

Take a look at this brochure, and feel free to call any of the EPA, state or other staff listed for more information.

CODES

O - OBSERVABLE P - PROCESS I - INTERVIEW

ADDITIONAL COMMENTS

No air violations were observed during this inspection.

CONCLUSION

The facility has some PCB containing capacitors (at least 200) which we were not able to inspect during our inspection. It may be an area the PCB Program may want to pursue further.

RECOMMENDATION FOR FOLLOW-UP

No follow-up except to forward the checklist to the PCB Program so they may inspect the facility for PCB containing materials if they deem it necessary.

Air Bob O'Meara/Chris Barry 565-3258 APC EPCRA(TRI) Linda Marinilli 565-3276 ATC EPCRA(Chm.Inv.)Don Mackie 860-4396 EEP-LEX FIFRA Pam Ringhoff 565-3932 APP RCRA Stan Chin/Joan Jouzaitis 573-5750 HRW-CAN3 SPCC Dave Tordoff 860-4364 EEE-LEX TSCA Suzanne Parent 565-3704 ATC UST Bill Torrey 573-9604 HPU-CAN2 WATER Steve Silva 565-2489 WCC WETLANDS Matt Schweisberg 565-4431 WWP UIC Dave Delaney 565-3615 WGP	Forwarded to	Contact	Phone	Mail Code
	EPCRA(TRI) EPCRA(Chm.Inv.) FIFRA RCRA SPCC TSCA UST WATER WETLANDS	Linda Marinilli Don Mackie Pam Ringhoff Stan Chin/Joan Jouzaitis Dave Tordoff Suzanne Parent Bill Torrey Steve Silva Matt Schweisberg	565-3276 860-4396 565-3932 573-5750 860-4364 565-3704 573-9604 565-2489 565-4431	APC ATC EEP-LEX APP HRW-CAN3 EEE-LEX ATC HPU-CAN2 WCC WWP

cc: Larry Brill HRL-CAN3

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